

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

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Illinois Commerce Commission  
RAIL SAFETY SECTION

UNITED TRANSPORTATION UNION,  
ILLINOIS STATE LEGISLATIVE BOARD

# Petition for rulemaking to require safe walkways for railroad employees in the state

T03-0015

**JOINT MOTION OF NORFOLK SOUTHERN RAILWAY COMPANY,  
ILLINOIS CENTRAL RAILROAD COMPANY, ET AL.,  
TO STRIKE STAFF “BRIEF ON EXCEPTIONS”**

Norfolk Southern Railway Company and Illinois Central Railroad Company, et al., (collectively, “Respondents”), move to strike the “Brief on Exceptions” filed by the Staff of the Illinois Commerce Commission. In support of this motion, Respondent attaches and incorporates a Memorandum in Support of the Joint Motion of Norfolk Southern Railway Company, Illinois Central Railroad Company, et al., to Strike Staff “Brief on Exceptions” And, in The Alternative, Brief in Reply.

For the reasons fully set forth in the Memorandum, the Respondents respectfully request that the Staff's "Brief on Exceptions" be stricken.

**DOCKETED**

JAN 29 2014

Dated: January 27, 2004

Respectfully submitted,

Norfolk Southern Railway Company

By: Stephen C. Carlson

One of its Attorneys

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Respectfully submitted,

Illinois Central Railroad Company, Grand  
Trunk Western Railroad Incorporated,  
Chicago, Central & Pacific Railroad  
Company, Wisconsin Central Ltd, and  
Wisconsin Chicago Link Ltd.

By: Michael J. Barron, Jr.  
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